1 2	DANIEL G. BOGDEN United States Attorney District of Nevada	
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4	BLAINE T. WELSH Assistant United States Attorney	
-	Nevada Bar No. 4790 333 Las Vegas Blvd. South, Suite 5000	
5	Las Vegas, Nevada 89101 Tel: (702) 388-6336	
6 7	Fax: (702) 388-6787 Email: Blaine.Welsh@usdoj.gov	
8	Attorneys for Defendant	
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11		
12	UNITED STATES DISTRICT COURT	
13	DISTRICT OF NEVADA	
14	ZANE E. GOODFIELD,	
15	Plaintiff,	) )
16	V.	
17	CAROLYN W. COLVIN,	) Case No.: 2:13-cv-01331-GMN-VCF
18	Acting Commissioner of Social Security,	
19	Defendant.	) ) )
20	UNOPPOSED MOTION FOR EXTENSION OF TIME (Second Request)	
21		
22	Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (Defendant), requests	
23	that this Court extend the time to respond to Plaintiff's Motion for Reversal and/or Remand thirty (30)	
24	days, until February 19, 2014. This is Defendant's second request for an extension of time. Plaintiff'	
25	counsel was contacted on January 16, 2014, and indicated that Plaintiff does not oppose the requested	

26 extension. Defendant's current deadline is January 20, 2014.

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The instant request is not intended to cause delay and is necessary because SSA OGC Assistant Regional Counsel Brenda Pullin who is assigned to this case has experienced a serious medical 2 emergency. Although Ms. Pullin has reviewed Plaintiff's motion and completed an outline of Defendant's Cross-Motion to Affirm, she is unable to finalize the response due to the referenced medical emergency. 5 For this reason, the parties request that Defendant be granted an additional thirty (30) day 6 extension of time to respond to Plaintiff's motion, up to and including February 19, 2014, with other scheduling order deadlines extended accordingly. 8 Respectfully submitted this 17th day of January 2014. 9 10 DANIEL G. BOGDEN **United States Attorney** /s/ Blaine T. Welsh 12 BLAINE T. WELSH **Assistant United States Attorney** 13 14 OF COUNSEL: DONNA L. CALVERT Acting Regional Chief Counsel 16 BRENDA M. PULLIN **Assistant Regional Counsel** Social Security Administration 18 19 No further extensions will be granted. 20 IT IS SO ORDERED: 22 23 UNITED STATES MAGISTRATE JUDGE DATED: \_\_1-24-2014 24 25

**CERTIFICATE OF SERVICE** 1 2 I, Blaine T. Welsh, certify that the following individual were served with a copy of the UNOPPOSED MOTION FOR EXTENSION OF TIME on the date, and via the method of service 3 identified below: 4 5 **Electronic Case Filing:** 6 Marc V Kalagian Rohlfing & Kalagian, LLP 7 211 E. Ocean Blvd. Suite 420 Long Beach, California 90802 8 Marc.Kalagian@rksslaw.com 9 Leonard Stone Shook & Stone, Chtd. 10 710 South Fourth Street Las Vegas, Nevada 89101 11 kshonfeld@shookandstone.com 12 Attorneys for Plaintiff 13 14 Dated this 17th day of January 2014 15 /s/ Blaine T. Welsh BLAINE T. WELSH 16 **Assistant United States Attorney** 17 18 19 20 21 22 23 24 25

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